

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3
4 **DREW J. RIBAR,**
5 Plaintiff,
6 v.
7 **WASHOE COUNTY, et al.,**
8 Defendants.

9 Case No.: 3:24-cv-00526-ART-CSD

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11 **NOTICE OF ERRATA REGARDING PLAINTIFF'S OPPOSITION TO**
TEMPORARY RESTRAINING ORDER (ECF No. 176)

12
13 Plaintiff **Drew J. Ribar**, appearing pro se, respectfully submits this **Notice of Errata** to correct a
14 typographical citation error contained in Plaintiff's **Opposition to Temporary Restraining**
15 **Order** (ECF No. 176), filed on October 31, 2025.

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17
18 **I. IDENTIFICATION OF ERROR**

19 On **Page 4** of the Opposition, in the **table entry referencing Exhibits 6 and 11**, the citation:

20
21
22 **"100% protected speech and petitioning activity (BELO Corp. v. Leath, 499 U.S. 340)"**

23
24 was inadvertently included in error. The case cited does not pertain to First Amendment
25 protections or legal petitioning activity.

26
27
28 PLEADING TITLE - 1

1 **II. CORRECTION**

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3 The correct citation to support the First Amendment protection for public complaints to

4 government and disciplinary agencies is:

5

6 **"Fully protected First Amendment petitioning activity (McDonald v. Smith, 472 U.S. 479,**

7 **483 (1985); Jacobs v. Adelson, 130 Nev. 134, 141, 321 P.3d 467, 472 (2014))"**

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9

10 **III. LEGAL BASIS FOR CORRECTION**

- 11
- 12 • **McDonald v. Smith, 472 U.S. 479, 483 (1985):**

13

14 The U.S. Supreme Court held that letters to government officials (in that case, accusing a

15 U.S. Attorney of favoritism) are **core First Amendment petitioning activity**, and

16 entitled to full constitutional protection.

- 17
- 18 • **Jacobs v. Adelson, 130 Nev. 134, 141, 321 P.3d 467, 472 (2014):**

19 The Nevada Supreme Court confirmed that complaints to **disciplinary or prosecutorial**

20 **agencies** (such as the **State Bar or DA's Office**) are made in **quasi-judicial proceedings**

21 and are **absolutely privileged** under Nevada law.

22

23

24 **IV. EFFECT ON MOTION**

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26 This correction does **not alter the substance** or argument of the Opposition. The point remains

27 that Plaintiff's bar complaints and communications regarding public officials are **fully protected**

28 PLEADING TITLE - 2

1 **by the First Amendment** and **immune from civil liability** under well-settled federal and state
2 law.
3

4 Plaintiff apologizes for the citation error and thanks the Court for its understanding.
5

6
7 **DATED:** October 31, 2025
8

9 Respectfully submitted,
10

11 **/s/ Drew J. Ribar**
12

13 Drew J. Ribar, Pro Se
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PLEADING TITLE - 3

1 **CERTIFICATE OF SERVICE**
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3
4

5 I certify that on October 31, 2025, I caused a true and correct copy of the foregoing **Notice of**
6

7 **Errata** to be served via email to:
8

9 **Lindsay Liddell**
10

11 **Alison Kertis**
12

13 Washoe County District Attorney's Office
14

15 lliddell@da.washoecounty.gov
16

17 akertis@da.washoecounty.gov
18

19 And by email to the United States District Court Clerk:
20

21 reno_public_docketing@nvd.uscourts.gov
22

23 **/s/ Drew J. Ribar**
24

25 Drew J. Ribar, Pro Se
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